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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

MR. STEVEN A. EHRLICH

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

07cv6377
JUDGE KOCORAS
MAG. JUDGE DENLOW

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

MS. CAROL VANCE, D.O.H.C.

DR. JOVITA ANYANWU, MEDICAL DIRECTOR

ADDUS HEALTHCARE, INC.

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

XXXXX COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

 COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

 OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: STEVEN A. EHRLICH
- B. List all aliases: NONE
- C. Prisoner identification number: 837805 [DHS]
- D. Place of present confinement: DEPARTMENT OF HUMAN SERVICES
TREATMENT & DETENTION FACILITY
- E. Address: R. R. 1, BOX 6A, HORNEY BRANCH RD., RUSHVILLE, IL. 62681-9788

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: MS. CAROL VANCE
- Title: DIRECTOR OF HEALTH CARE
- Place of Employment: DHS/TDF RUSHVILLE/JOLIET [ADDUS HEALTHCARE, INC.]
- B. Defendant: DR. JOVITA ANYANWU,
- Title: MEDICAL DIRECTOR
- Place of Employment: DHS/TDF RUSHVILLE/JOLIET [ADDUS HEALTHCARE, INC.]
- C. Defendant: ADDUS HEALTHCARE, INC.
- Title: CONTRACTED HEALTHCARE PROVIDER FOR DHS/TDF RUSHVILLE/JOLIET
- Place of Employment: CORP.: 2401 S. PLUM GROVE RD., PALATINE, IL. 60067

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. Exhaustion of Administrative Remedies

You are required to exhaust all your available administrative remedies before bringing an action in federal court.

A. Is there a grievance procedure available at your institution?

YES (☒) NO (☐) If there is no grievance procedure, skip to F.

B. Have you filed a grievance concerning the facts in this complaint?

YES (☒) NO (☐)

C. If your answer is YES:

1. What steps did you take?

Grievances filed

2. What was the result?

Grievances either denied or never answered

3. If the grievance was not resolved to your satisfaction, did you appeal?
What was the result (if there was no procedure for appeal, so state.)
Decision was appealed. Appeal never answered.

D. If your answer is NO, explain why not:

N/A

- E. Is the grievance procedure now completed? YES (x) NO ()
- F. If there is no grievance procedure in the institution, did you complain to authorities? YES () NO () N/A

G. If your answer is **YES**:

1. What steps did you take?

2. What was the result?

H. If your answer is **NO**, explain why not:

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: Ehrlich v Mantzke
01-C-7449
- B. Approximate date of filing lawsuit: June 24, 2001
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Steven A. Ehrlich

- D. List all defendants: Michelle Mantzke, Angela Bratcher, Dr. Travis
Hinze, Timothy Budz, Kevin Jestice, Dr. Robert Brucker, Jr., Sally Hougas

- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): U. S. District Court, Northern District
- F. Name of judge to whom case was assigned: Charles Kocoras
- G. Basic claim made: Due Process Violations

- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Settlement Agreement January 10, 2003

- I. Approximate date of disposition: January 10, 2003

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

GO TO PAGE 5A

IV. List ALL Lawsuits you (and your co-plaintiffs, if an) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

A. Name of case and docket number: Ehrlich v. Howard Peters III, et. al.

B. June 07, 2001 01-C-4277

C. Steven A. Ehrlich

D. Howard Peters III, Linda Renee Baker, Mary Bass, Timothy Budz, Thomas Monahan, Dr. Raymond Wood, Robert Glotz, John Hargis, Joe Dorsey, Angela Bratcher, Brad Grenoble, and Roberta Fewes

E. U. S. District Court, Northern District of Illinois

F. Charles Kocoras

G. Conditions of Confinement

H. Pending

I. N/A See ¶H

V. Statement of Claim:

State here as briefly as possible the facts of your case. Describe precisely how each defendant is involved. Include also the names of other persons involved, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Plaintiff is a civil detainee in the custody of the Illinois Department of Human Services [hereinafter "DHS"] pursuant to Illinois' Sexually Violent Persons Commitment Act [hereinafter "SVP"] [hereinafter the "Act"], 725 ILCS 207/1 et. seq.

November 05, 2003 the Plaintiff underwent cataract eye surgery at the University of Illinois Medical Center at Chicago [hereinafter "U of I"] having had the lens of his left eye replaced.

April, 2006 the Plaintiff as seen by Dr. Brent Schoppe [hereinafter "Schoppe"] the eye doctor at the Joliet Treatment & Detention Facility [hereinafter "TDF"] because he was having increasing trouble seeing out of his left eye. Schoppe explained to the Plaintiff that there was a film growing over the Plaintiff's left lens, a condition commonly referred to as a "Secondary Cataract" and that this is common approximately three [3] years after having a lens replacement, and that the Plaintiff's left eye would have to be lasered. That this is a simple procedure. Schoppe then wrote an "order" for the Plaintiff to be transported to the U of I for treatment. Schoppe told the Plaintiff it should take approximately two [2] weeks to get him into U of I.

Between the time of being seen by Schoppe, April, 2006 [Plaintiff doesn't have exact date] until being transferred to Rushville, June 19, 2006, the Plaintiff repeatedly to Dr. Jovita Anyanwu [hereinafter "Anyanwu"] Medical Director and Ms. Carol Vance [hereinafter "Vance"] Director Of Health Care about not being able to see.

The Plaintiff complained about, but not limited to, not being able to read, normal written material without the use of a magnifier, not being able to read small print even with the use of a magnifier, not being able to fill out forms [including but not limited to Swanson Commissary Order forms], not being able to type, or, see what he is typing or has typed as well as being able to see or read everyday activities that are taken for granted. Plaintiff's vision was the equivalent of being legally blind.

Prior to the aforementioned, vision in the Plaintiff's left eye was 20/20. The reason for the Plaintiff not being able to see is that the vision in the Plaintiff's right eye has been 20/200 all his life, his right eye having been permanently damaged at birth. Therefore, Plaintiff's left eye has always been his primary source of vision his entire life.

Additionally, the Plaintiff has an equalibrium problem. Equilibrium is controlled by three [3] functions, one of which is vision. The aforementioned really affected the Plaintiff's equilibrium.

June 19, 2006 the Plaintiff was transferred to Rushville, Illinois as the entire SVP program was being relocated to Rushville, Il. from Joliet, Il. Up to this point, the Plaintiff had not been sent to U of I for corrective treatment.

At Rushville, Anyanwu continued as Medical Director and Vance as Director of Health Care as well as Addus HealhCare, Inc. continuing as the TDF' contractual health care provider.

After arriving at Rushville, the Plaintiff continued to complain verbally and in writing, to Anyanwu and Vance about not being able to see, the multitude of problems it was causing, and not yet having been sent for corrective treatment, all to no avail.

Finally, January 26, 2007 the Plaintiff was sent to the Culbertson Memorial Hospital in Rushville for corrective eye laser treatment. Said procedure was performed by Dr. M. Morrisy, an ophthalmologist with Prairie Eye Clinic in Beardstown, Il. whom the Plaintiff had been examined by approximately a month prior to his left eye being lasered.

The Plaintiff was forced by Anyanwu and Vance to suffer for ten [10] months, not being able to see, for a corrective laser procedure that took let than one [1] minute.

VI. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

EXEMPLARY [PUNITIVE] DAMAGES: \$ 1,000,000.00

ACTUAL [COMPENSATORY; GENERAL] DAMAGES: \$ 1,500,000.00

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 5th day of November, 2007



(Signature of plaintiff or plaintiffs)

Steven A. Ehrlich

(Print name)

837805

(I.D. Number)

R. R. 1, Box 6A, Horney Branch Rd., Rushville, Il.

62681-9788

(Address)


STATE OF ILLINOIS)
)ss
COUNTY OF SCHUYLER)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

A F F I D A V I T

I, Steven A. Ehrlich, having first been duly sworn under oath and penalty of perjury pursuant to 28 USC §1746, 18 USC §1642 and 735 ILCS 5/1-109, do hereby state, aver and depose that I subscribed to the foregoing document herein, and that the contents are correct both in substance and in fact, to the best of my knowledge and belief.

FURTHER, AFFIANT SAYETH NOT.



Steven A. Ehrlich
Affiant, pro-se
R. R. 1, Box 6A
Rushville, Il. 62681-9788

November 05, 2007

Dated